

Brad M. Purdy
Attorney at Law
Bar No. 3472
2019 N. 17th St.
Boise, ID. 83702
(208) 384-1299
FAX: (208) 384-8511
bmpurdy@hotmail.com
Attorney for Intervenor
Community Action Partnership
Association of Idaho

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2013 AUG -6 PM 3:08
IDAHO PUBLIC
UTILITIES COMMISSION

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION)	CASE NO. PAC-E-13-04
OF PACIFICORP DBA ROCKY MOUNTAIN)	
POWER TO INITIATE DISCUSSIONS WITH)	SECOND AFFIDAVIT OF
INTERESTED PARTIES ON ALTERNATIVE)	BRAD M. PURDY IN
RATE PLAN PROPOSALS)	SUPPORT OF MOTION TO
)	COMPEL
)	
)	
)	

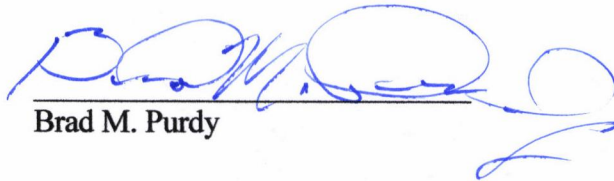
Affiant being first duly sworn upon oath, hereby deposes and states as follows:

1. That he is legal counsel of record for the Community Action Partnership Association of Idaho (CAPAI) and, as such, possesses sufficient information and knowledge to attest to the statements set forth herein.
2. That attached to this Affidavit as Exhibit "A" is a true and correct copy of an email received by Affiant from Mr. Daniel Solander on August 2, 2013.
3. That attached to this Affidavit as Exhibit "B" is a true and correct copy of the Word document attached to Exhibit A.
4. That affiant has been informed that Exhibit B was never filed with the Idaho Public Utilities Commission in this proceeding.

5. That affiant has been informed by the Commission Secretary that the Commissioners are unavailable to hear oral argument on CAPAI's Motion to Compel during the week of August 12-16, 2013.

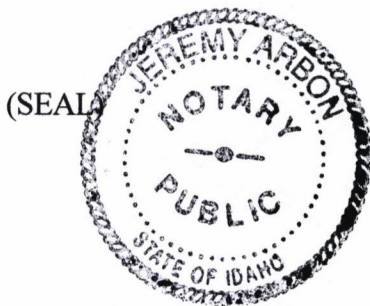
FURTHER your affiant saith not.

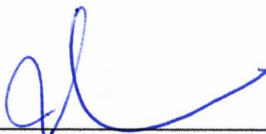
DATED this 6TH day of August, 2013.



Brad M. Purdy

SUBSCRIBED AND SWORN TO before me this 6th day of August, 2013.





Notary Public for Idaho
Residing at Boise, Ada County, Idaho
My Commission expires: 10/18/2016

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 6th day of August, 2013, I served a copy of the foregoing document on the following by electronic mail and U.S. Postage, first class.

Ted Weston
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
ted.weston@pacificorp.com

Daniel E. Solander
Rocky Mountain Power
201 South Main, Suite 2300
Salt Lake City, UT 84111
daniel.solander@pacificorp.com

Electronic Service Only:
Data Request Response Center
PacifiCorp
datarequest@pacificorp.com

Neil Price
Deputy Attorney General
Idaho Public Utilities Commission
472 W, Washington (83702)
P0 Box 83720
Boise, ID 83720-0074
neil.price@puc.idaho.gov

Randall C. Budge
Racine, Olson, Nyc, Budge & Bailey
201 E. Center
P0 Box 1391
Pocatello, ID 83204-1391
E-Mail: rcb@racinelaw.net

Brubaker & Associates
16690 Swingley Ridge Rd., #140
Chesterfield, MO 63017
bcollins@consultbai.com

James R. Smith
Monsanto Company
P.O. Box 816
Soda Springs, ID 83276
Jim.r.smith@monsanto.com

Eric L. Olsen
ASSOCIATION, INC: Racine, Olson, Nye, Budge & Bailey
(Exhibit Nos. 30 1-400) 201 E. Center
P0 Box 1391
Pocatello, ID 83204-1391
elo@racinelaw.net

Anthony Yankel
29814 Lake Road
Bay Village, OH 44140
tony@yankel.net

Benjamin J. Otto
Idaho Conservation League
710 N. 6th St.
Boise, ID 83702
botto@idahoconservation.org

Ronald Williams
Williams Bradbury, P.C.
1015 W. Hays St.
Boise, ID 83702
ron@williamsbradbury.com

Don Schoenbeck
RCS, Inc.
900 Washington St., Suite 780
Vancouver, WA 98660
dws@r-c-s-inc.com

Tim Buller
Agrium, Inc.
3010 Conda Rd.
Soda Springs, ID 83276
TBuller@agrium.com

Ken Miller
Snake River Alliance
Box 1731
Boise, ID 83701
E-Mail: kmiller@snalteriveralliance.org

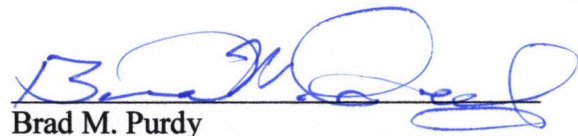

Brad M. Purdy

EXHIBIT A

RE: Case PAC-E-13-04: CAPAI Motion

From: **Solander, Daniel** (Daniel.Solander@pacificorp.com) This sender is in your [contact list](#).

Sent: Fri 8/02/13 3:48 PM

To: brad purdy (bmpurdy@hotmail.com)

Cc: Moench, Mark (Mark.Moench@pacificorp.com); Larsen, Jeff (Jeff.Larsen@pacificorp.com); Weston, Ted (Ted.Weston@pacificorp.com); McDougal, Steven (Steven.McDougal@pacificorp.com)

1 attachment

Idaho 2013 Motion to Compel Term Sheet.docx (21.0 KB)

Brad,

As we discussed, here is the Company's written proposal for resolving CAPAI's motion to compel. Please let me know if you have any questions.

Daniel E. Solander

Senior Counsel

Rocky Mountain Power

One Utah Center

201 South Main Street, Suite 2300

Salt Lake City, Utah 84111

(801) 220-4014 Direct Dial

(801) 803-1240 Cell

THIS COMMUNICATION MAY CONTAIN CONFIDENTIAL INFORMATION AND MAY BE SUBJECT TO ATTORNEY-CLIENT PRIVILEGE, THE ATTORNEY WORK PRODUCT DOCTRINE, THE JOINT DEFENSE PRIVILEGE, AND/OR OTHER PRIVILEGES. If you are not the intended

recipient(s), or the employee or agent responsible for delivery of this message to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this e-mail message is strictly prohibited. If you have received this message in error, please immediately notify the sender and delete this e-mail message from your computer.

From: brad purdy [mailto:bmpurdy@hotmail.com]

Sent: Tuesday, July 30, 2013 4:59 PM

To: Weston, Ted; Ron Williams; tbuller@agrium.com; Ken Miller; Ben Otto; Eric Olsen; jim.r.smith@monsanto.com; Price, Neil (ID PUC); Randy Lobb; Randy Budge; STEVEN D (AG1000) ((; (;

Solander, Daniel

Cc: Christina Zamora

Subject: Case PAC-E-13-04: CAPAI Motion

Attached, please find a Motion to Compel (responses to discovery) and supporting Affidavit and Brief filed today with the IPUC by the Community Action Partnership Association of Idaho.

Brad M. Purdy
Attorney at Law
2019 N. 17th St.
Boise, ID 83702
208-384-1299 Land
208-484-9980 Cell
208-384-8511 Fax
bmpurdy@hotmail.com

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PURSUANT IDAHO RULES OF EVIDENCE RULE 408

TERM SHEET RESOLVING MOTION TO COMPEL
AND IDAHO RATE PLAN

- The Company's position is that we have no duty to perform a study on the cost of service information since the Company does not maintain the information in the format CAPAI has requested, and has not completed the study requested.
- The Company is, however, willing to spend Company personnel time and resources to complete the data request response provided we obtain some value in return.
- Accordingly, the Company proposes:
 - (1) that in return for the Company completing the cost of service study requested in Data Request 6(b) and providing the results to CAPAI as well as making appropriate Company personnel available to discuss the study and results, CAPAI agrees to withdraw its Motion to Compel and further agrees not to oppose the rate plan stipulation; and
 - (2) the Company will agree to hold a collaborative process to further discuss and review the cost of service issues that have been raised by CAPAI in this proceeding, and to discuss what action the Company should take or propose for Commission approval as a result of the cost of service studies.